

ONE MARITIME PLAZA
23RD FLOOR
SAN FRANCISCO, CALIFORNIA 94111-3577
(415) 392-7077
FAX (415) 392-3969

KECK, MAHIN & CATE

FILE NUMBER

DOCKET 94-29

June 4, 1994

DIRECT DIAL

Secretary,
Federal Communications Commission
1919 M Street
Washington DC 20036

JUN 6 1994
FCC MAIL ROOM

Re: MM-Docket 94-29, RM 8416, Willows and Dunnigan, CA

Dear Mr. Secretary

Enclosed please find an original and four copies of a Comment opposing the changes proposed in the above referenced proceeding.

Keck, Mahin & Cate

Roger J. Metzler

No. of Copies rec'd
List ABCDE

24

DOCKET FILE COPY ORIGINAL

Before the
Federal Communications Commission

MM Docket No. 94-29

In the Matter of)
)
Amendment of Section 73.202(b),)
Table of Allotments,)
FM Broadcast Stations,)
(Willows and Dunnigan, California))

RM-8416

JUL 6 1994

FCC MAIL ROOM

To: Acting Chief, Allocations Branch,

COMMENTS OF RIVER CITIES RADIO, L.P.

River Cities Radio, L.P., a California limited partnership ("River Cities"), through counsel, hereby files its Comments in the Proposed Rulemaking in which KIQS, Inc. seeks to modify the Table of Allotments by the substitution of Channel 288B1 for Channel 288A at Willows, the reallocation of Channel 288B1 from Willows to Dunnigan, California, and modification of the license for Station KIQS-FM.

1. River Cities is the licensee of KMYC and KRFD, licensed to Marysville, CA.¹ KRFD's signal is heard in the area to which KIQS seeks to move and therefore KIQS-FM will compete with KRFD for listeners and business. River Cities thus has standing to file this comment.

2. The proposed 'move-in' seeks to take the only FM from the town of Willows and move it, in its entirety², to the 'town' of Dunnigan. Dunnigan started out, according to the Dunnigan proposed general plan, as "an agricultural service center, sited along the railroad" Dunnigan hasn't changed much, except it is no longer a center of anything. Today Dunnigan is small cluster of residences in one subdivision and wide spot in the

¹River Cities recently filed an application to assign its licenses to Marysville Radio, Inc.

²City grade contours and secondary service contours for the proposed class B1 facility at Dunnigan do not include any part of the previously authorized Class A service are at Willows, so the change in service is dramatic as well as significant to the Willows residents who are left with only a 250 watt daytime AM stations as their local facility.

road with a post office and general store. KIQS has said that Dunnigan has 700 residents³, its own zip code, a post office, a town hall, and a community plan. To that impressive list River Cities would add that Dunnigan also has a general store. But that's about all that the Dunnigan area has⁴. That list does not make Dunnigan a community. In fact, River Cities believes that the list shows just the opposite. There are much larger areas throughout the country with all those attributes (and more) that aren't separate communities. For example, there are city blocks (even hotels) with more than 700 residents, and numerous subdivisions inside real communities with their own post offices, their own zip codes, and their own plans for development. There are condominium associations with their own government, the ability to assess members and even private security forces. Simply reciting that about 700 people live in one area and have a few of the things that show up when 700 people live in one area does not make an area a community for allocation purposes.

3. Since KIQS avoided saying how many or what kind of business Dunnigan has when reporting that Dunnigan had business, River Cities thinks it is instructive to look at what Dunnigan does not have. To find out about Dunnigan's so-called businesses and civic clubs, River Cities looked for a Dunnigan telephone book. There is no phone book dedicated to Dunnigan, but attached as Exhibit A are several pages from the Pacific Bell telephone book covering the area that includes Dunnigan⁵. It is very interesting. It shows, for example, that there is no number at which one may contact the Dunnigan police department, probably because there is no Dunnigan police department. Page 8 from the Pacific Bell telephone book lists a lot of parks and recreation areas, but shows no listing of parks for Dunnigan. Pages 10 and 11 list shopping areas and farmer's markets, but show nothing in the way of shopping areas or farmer's markets for Dunnigan. There are other normal indicators of community that are not found in Dunnigan. Dunnigan has no local public school. The nearest school is in Arbuckle, a community about 10 miles away. River Cities found no service organizations, or any other indicia of a real community. Dunnigan may have a community plan but it doesn't have a real community.

4. KIQS has said that Dunnigan is a community, said there is a post office and a zip code and has included a plan that says how Dunnigan might be a real community some day. Is that enough? River Cities does not think so and points out that it is always hard to prove a negative. How can someone show Dunnigan is not a community? One way is to see if there are real indicia of a

³Dunnigan is not listed in the US. Census (which ought to be some indication of lack of community). Based on information and belief, River Cities believes the number to be more like 500. The Dunnigan postmaster told a River Cities employee that 500 was a lot closer to the population than 700.

⁴KIQS also says that Dunnigan has identifiable boundaries. So does a football field, but that does not make it a community for allocation purposes.

⁵The first page shows that the Dunnigan area is covered. It shows Davis at the bottom right, Woodland in the center and Dunnigan at the top middle.

community, i.e., parks, churches, hospitals, clinics, doctors and dentists, fraternal organizations, schools, shopping centers, little leagues, local businesses, taxing authorities, local government (mayor, city council or some form of governance), governmental services provided by the town, theaters, libraries, in short, places where people conduct their daily life and institutions that help in that effort. Measured by that standard, the KIQS' showing fails miserably. With a community not listed in the Census, one would think that KIQS would have worked diligently to present every evidence of community for the Commission. If it did so, the list of what is supposed to show Dunnigan is a community is woefully inadequate.

5. KIQS has provided a copy of a general plan that was apparently prepared by a consultant, and "conceptually approved" by a steering committee in 1992, but no evidence that the plan has ever been adopted⁶. Assuming the plan was adopted, a plan for what happens in the future for an area is not any evidence of a present community, no more than the book 1984 was evidence of the year 1984 when it was written decades earlier. KIQS said that there is a post office and a zip code and a town hall. Having a post office, a zip code, a town hall and a general store does not make a community, even if there is a general plan that says the community will have a post office, a zip code, a town hall and a general store⁷. If there is no 'community' at Dunnigan, then no allotment to that 'community' can be made.

6. Assuming, arguendo, that Dunnigan is a community for allotment purposes, there are other reasons why the Commission should not allot the proposed channel to Dunnigan and remove it from Willows. The Commission has said it will use its FM allotment priorities in deciding whether to take a signal from one community and adding it to another. Those FM allotment priorities are (1) first aural service, (2) second aural service, (3) first local service, and (4) other public interest matters. This case does not involve the first two priorities. It involves "first local service" and "other public interest matters".

7. During the course of the rulemaking that ultimately authorized the procedure under which KIQS is applying, there were numerous commenters who expressed reservations about the proposed rule. These comments were all concerned that the proposed change to the rule would encourage proposals just like the instant proposal. The Commission, responding to the NAB's concerns about

⁶The Commission said that the petitioner provided "declarations of an elected county official", but it is extremely unlikely that the official, an assistant county planner, is actually an elected position. And if he were, he was elected for the county of Yolo, not Dunnigan.

⁷In fact, the general plan talks about subdivisions to come, about businesses that will be there someday, about a roadway network that will be developed sometime, about a new Town Center to come when 'local-serving' businesses arrive. To describe it as a "pipe dream" is probably unfair to the people who worked to put the plan together, but to describe it as a wish list for the future seems fairly accurate. It certainly is not reflective of the present.

an exodus of stations from underserved rural areas to well served urban areas, said

"[i]n those cases in which congestion [of channels] does not, as a threshold matter, foreclose reallocation of a channel from an underserved rural area to a well-served urban area, application of our allotment criteria should achieve this result. Consistent with precedent, we do not intend to apply the first local service preference of our allotment criteria blindly. We recognize that an inflexible application of that preference, without further analysis, could consistently result in our finding that a reallocation leading to a first local service for a suburb of a much larger adjacent metropolitan center justifies removing a local service from a more remote community. We wish to dispel any concern that our new rule would lead to such a result." (Amendment of the Commission's Rules regarding Modifications of FM and TV Authorizations to Specify a New Community of License, MM Docket 88-526, 68 RR2d 644 (1990))

8. The Willows\Dunnigan proposal is one of those cases in which the Commission has to pay special attention to what is going on. Dunnigan is part of the Sacramento Metropolitan area⁸. The reason that KIQS will cover so many new people with the move-in and upgrade is simple. KIQS is moving to get closer to a much larger adjacent metropolitan center. With the new coverage, it will cover the Sacramento market.

9. The Commission has faced this kind of case before. In the Anniston\Sandy Springs⁹ case, the FCC was faced with this same situation. In that case, the community of Sandy Springs was located within the Atlanta Urbanized area. In this case, Dunnigan is in the Sacramento Metropolitan area. In that case the Commission asked whether Sandy Springs can be considered separate from the Atlanta Urbanized area. In this case, the question is whether Dunnigan can be separated from the larger urban area in which it is located. In the Sandy Springs case, that community had a number of things showing its separate identity, including a 70,000 population. Dunnigan may have 700 population. Sandy Springs had no separate municipal services, and Dunnigan apparently does have a separate water district (it being in an agricultural area), but no separate sewer, school, public transportation or similar services. Dunnigan has a volunteer fire department but no police. The Sandy Springs petitioner claimed that Sandy Springs had 24 churches, 16 shopping centers, offices, a Chamber of Commerce and dozens of civic organizations. The Dunnigan petitioner claims that Dunnigan has churches (KIQS mentions no numbers, could be two), businesses (KIQS mentions no numbers, could be two), and civic clubs (KIQS mentions no numbers, could be two). There is no claim of a chamber of commerce, no claim that there is any local

⁸The attached Exhibit B shows that Yolo county, in which Dunnigan is situate, is part of the Sacramento Metro, TSA and ADI.

⁹Amendment of Section 73.202(b), Table of Allotments, FM Broadcast Stations (Eaton ton and Sandy Springs, Georgia and Anniston and Linville, Alabama) MM Docket no. 89-585, 70 RR 2d (could be two)182, 1991).

government, no shopping centers, and so forth. The Commission found against the Sandy Springs allotment, and it should find against this one.

10. Certainly Dunnigan cannot support a radio station. Exhibit C is a collection of photographs showing what Dunnigan looks like. With two (maybe three) businesses, obviously the area is dependent on the surrounding area for every major service, for food and for recreation. Sandy Springs did not get any credit for being a first local service, and it seems clear that this Dunnigan proposal should not get such a credit either.

11. That leaves the "other public interest matters". Like disproving that Dunnigan is a community, this is a slippery concept to discuss. First, River Cities strongly believes that since Dunnigan is in reality not a community, there is no public interest in assigning a station, any station, there. In addition, although the Commission has long recognized that there is a public interest benefit from increasing the power of a station, there is also a strong countervailing public interest benefit in maintaining existing services. That public interest argues against the Dunnigan proposal, as it would result in the loss of service to a large number of people. In the Sandy Springs case, the Commission acknowledged that the proposal would result in a superior arrangement of new allotments¹⁰ but even that was not enough. The FCC restated its long held position that curtailment of service is not in the public interest and denied the Sandy Springs move-in. It did that even though, given a clean slate, the FCC would have preferred the allotment scheme that included a facility at Sandy Springs.

12. Thus, even if Dunnigan were a community, and even if there were some way to say that the Dunnigan allotment scheme were superior to the existing allotments, River Cities strongly believes that the public interest does not favor taking the only FM out of Willows, leaving Willows only local aural service being a 250 watt daytime AM station, just so that KIQS can get a signal closer to the lucrative Sacramento market and serve an already well served population. Thus River Cities believes that 10,475 people losing service area coverage from the KIQS move-in is not in the public interest and that the Dunnigan proposal is precisely the kind of migration to the more densely populated areas¹¹ that the Commission vowed to prevent when it said "We recognize that an inflexible application of that preference, without further analysis, could consistently result in our finding that a reallocation leading to a first local service for a suburb of a much larger adjacent metropolitan center justifies removing a local service from a more remote community. We wish to dispel any concern that our new rule would lead to such a result." (Amendment of the Commission's Rules regarding Modifications of FM and TV Authorizations to Specify a New

¹⁰A showing apparently not done by KIQS.

¹¹According to KIQS, the proposed allotment yield an increase of 379% in area served but the population served would increase by 1440%. Obviously KIQS is going to a much more densely populated area.

Community of License, MM Docket 88-526, 5 FCC Red 7094, 68 RR2d 644 (1990).

Thus, for all the above reasons, the Commission should decline to modify the Table of Allotments by the reallocation of Channel 288B1 from Willows to Dunnigan, California.

Respectfully Submitted,
River Cities Radio, L.P.,
a California limited partnership

Date June 4, 1994

By: 
Roger J. Metzler, its attorneys

Keck, Mahin & Cate
1 Maritime Plaza, 23rd Fl.
San Francisco, CA 94111

PROOF OF SERVICE BY MAIL

I declare that I am employed in the City and County of San Francisco, California; I am over the age of 18 years and not a party to the within action; my business address is One Maritime Plaza, 23rd Floor, San Francisco, California 94111.

On June 4th, 1994, I served the attached Comment on all interested parties in said action by personally delivering a true copy thereof by overnight courier, enclosed in a sealed envelope, with postage thereon fully prepaid, addressed as follows:

Roy Stewart, Chief, Mass Media Bureau
Federal Communications Commission
1919 M Street, N.W.,
Washington, DC 20554

Arthur B. Goodkind, Esq.
Koteen & Naftalin
1150 Connecticut Avenue, N.W.
Washington, DC 20036

Robert Lewis Thompson, Esq.
Pepper & Corazzini
200 Montgomery Building,
1776 K street, N.W.
Washington, DC 20006

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on June 4, 1994, at Walnut Creek, California.



Roger J. Metzler

EXHIBIT A



For Emergency Calls Only

Para Llamadas de Emergencia Unicamente

9-1-1

An emergency is a situation that threatens human life or property and demands immediate attention. Do not call 9-1-1 for non-emergencies, this causes delays in the handling of real emergencies.

Se considera como una emergencia las situaciones en las que bienes de una persona peligran y las cuales requieren de atención inmediata. Sólo llame al 9-1-1 en caso de una emergencia, por lo contrario las llamadas que verdaderamente son urgentes.



Fire and Rescue
Incendio y Rescate



**Police, Sheriff and
Highway Patrol**
**Policia, Sheriff y
Patrulla de
Caminos**



Ambulance
Paramedics
Ambulancia
Paramédico



Coast Guard and Rescue
Guardacostas
Búsqueda y Rescate

NON-EMERGENCY CALLS: LLAMADAS QUE NO SEAN DE EMERGENCIA:

CITY/CIUDAD

DAVIS

WINTERS

WOODLAND

POLICE/POLICIA

756-3740

795-2261

666-2411

FIRE/INCENDIO

756-3743

795-4131

662-3211



Telecommunications
Device for the Deaf (TDD) emergency calls.

Baudot mode only:

- * Dial 9-1-1
- * Press the space bar until someone answers



**Llamadas de emergencia Aparato
Telecomunicaciones para los Sordos (TDD).**

Baudot aparatos solamente:

- * Marque 9-1-1
- * Oprima la barra espaciadora hasta que alguien le conteste

9-1-1 and Your Privacy

When calling 9-1-1, your number and address may be displayed on a viewing screen. This enables the emergency agency to locate you if the call is interrupted.

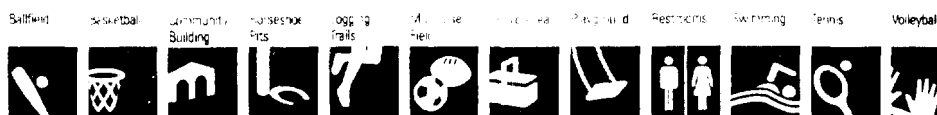
If you do not wish to have your telephone number and address displayed, call the appropriate 7-digit emergency number found in the Government listing pages preceding the White Pages.

9-1-1 y su Privacidad

Cuando usted reporta una emergencia marcando 9-1-1, su número y su dirección podrán ser mostrados en una pantalla. Esta información le permite a la agencia que está atendiendo la emergencia localizarlo rápidamente en caso de que la llamada se corte.

Si usted no desea que su número telefónico y su dirección sean mostrados en la pantalla, llame el número de 7 dígitos de emergencia encontrado en las páginas de clasificaciones del Gobierno que preceden las Páginas Blancas.

Need Directions? Use the blue code numbers with the map on page 2 to pinpoint the location.



Special Features

Davis												
Chestnut Park 757-5626 Chestnut Ln. and Alice St.	C5	●	●			●	B	●	●		①	●
Community Park 757-5626 Covell Blvd. and F St.	C5	① 2	●		●	●	B	3	●	●	⑫	●
Pioneer Park 757-5626 Hamel St. and Swingle Dr.	D6	●	●			●	●	2	●		2	●
Slide Hill Park 757-5626 Temple Dr. and Tulip Ln.	C6	2	●			●	●		●	3	2	●
West Manor Park 757-5626 End of Portage Bay Ave. near Cumberland Pl.	C5		●	●		●	B	●	●		●	●
Westwood Park 757-5626 Calaveras Ave. and Barkley St.	C5	●	●	●		●	B	●	●			●
Woodland												
Christiansen-Camarena Park 661-5880 Beamer and Walnut Sts.	B5	① 1		●		●	B	●	●			●
Crawford Park 661-5880 College St. and El Dorado Dr.	B5		●	●	●		B	●	●		④	2
Hanna Campbell Park 661-5880 Thomas St. and Colette Way	B5		●		●		B	●	●			●
John Ferns Park 661-5880 W. Southwood Dr. and Ashley Ave.	B5			●			B	●	●		②	●
Southland Park 661-5880 Elm St. and Maedell Way	B5	●				●	B	●	●	●		
Woodside Park 661-5880 Cottonwood St. and W. El Dorado Dr.	B5			●	●		B	●	●		②	●

② Number of lighted facilities 9 Number of unlighted facilities ● Available feature B Barbecue

For More Information

Please turn to the following
SMART Yellow Pages sections:

Local Area Pages

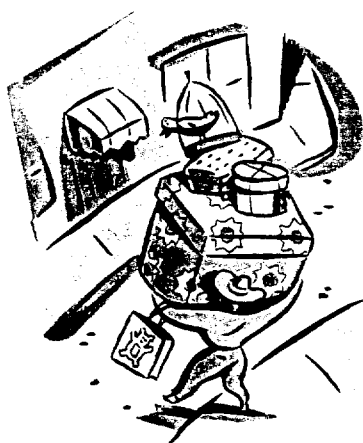
Regional Parks

9

A - Z Section

Baseball Batting Ranges	82
Bowling	96
Card Playing Rooms	105
Golf Courses-Miniature	198
Golf Courses-Public	198
Health Clubs	201
Racquetball Courts-Public	335
Recreation Centers	343
Riding Academies	357

Skating Rinks	379
Squash Courts-Public	384



For More Information

Please turn to the following
SMART Yellow Pages section:

A Z Section

Antiques-Dealers	18
Associations	24
Chambers Of Commerce	113
Department Stores	155
Factory Outlets	172
Flea Markets	179
Grocers-Retail	199
Markets	239
Pharmacies	287
Shopping Centers & Malls	376
Thrift Shops	402

Shopping Centers

Need Directions? Use the blue code numbers with the map on page 2 to pinpoint the location.

Listings marked with an * are outside the map coverage area.

Davis

Downtown

756-8763

Bordered by A, G, 1st and 8th Sts.

[D5]

This renovated area houses more than 100 shops, including:

- Davis Food Co-Op
- Davis Lumber and Hardware
- Discoveries
- 12 clothing stores
- 11 sporting goods stores
- 8 bookstores
- 7 jewelers
- 7 record stores
- 5 art galleries
- 4 gift shops
- 3 optical shops
- antique shop
- beauty supplies store
- electronics store
- picture-framing shop

El Macero Shopping Center

758-6900

Mace Blvd. and Chiles Rd.

[D6]

14 stores, including:

- Carpeteria
- Nugget Market
- gift shop
- specialty coffee and tea shop

Farmtown Shopping Center

758-4880

Lake Blvd. and Arlington Blvd.

[D5]

20 stores, including:

- Farmtown Market
- carpet outlet store
- custom purse store
- furniture rental store
- gift shop
- religious bookstore

The Marketplace

758-2522

W. Covell Blvd. and Sycamore Ln.

[D5]

20 stores, including:

- Big 5 Sporting Goods
- Longs Drugs
- McCaulou's Department Store
- Safeway supermarket
- Asian grocery store
- athletic shoe store
- beauty supplies store
- card shop
- optical shop
- pet supplies store
- purified water store

University Mall

648-2000

Russell Blvd. and Anderson Rd.

[D5]

30 stores, including:

- Clothestime
- PayLess Drug Store
- Safeway supermarket
- athletic clothing shop
- athletic shoe store
- beauty supplies store
- bookstore
- card shop
- clock shop
- fabric store
- florist
- hobby shop
- jeweler
- picture-framing shop
- shoe store
- specialty coffee shop
- trophy and key shop

Vacaville

Alamo Plaza

415/693-9000

Alamo Dr. and Merchant St.

[*]

20 stores, including:

- Orchard Supply Hardware
- children's clothing store
- jeweler
- pet shop
- shoe store
- Western apparel shop

Downtown

Bordered by Merchant, Main and Cernon Sts.

[*]

Six blocks of stores, including:

- Ben Franklin
- 4 gift shops
- 2 clothing stores
- 2 furniture stores
- ceramics shop
- electronics store
- fabric store
- jeweler
- musical instruments store
- sporting goods store
- stationer

Factory Stores at Nut Tree

707/447-5755

Nut Tree Rd. and Orange Dr.

[E3]

This 12-building center has 130 discount outlet stores

- Adolfo
- Aileen
- Barbizon
- Bass
- Benetton
- Bugle Boy
- b.u.m. Equipment
- Capezio
- Converse
- Corning/Revere
- Evan-Picone
- Geoffrey Beene
- Johnston & Murphy
- Leslie Fay
- Maidenform
- 9 West
- Oneida
- Royal Doulton
- Sergio Tacchini
- Vanity Faire

Golden Hills Shopping

929-3636

Alamo Dr. and I-80

[*]

25 stores, including:

- Food 4 Less
- Radio Shack
- computer store
- fabric store
- musical instruments store
- party supplies store
- pet shop
- used books store

Commons

140
wy. and Harbison Dr.

including:
Sporting Goods
k Fabrics

ss for Less
supermarket

g stores
ops
ores
plies store
p
r store
store
top
store

je at Vacaville
ey Pkwy. and E. Monte Vista Ave.

including:

s Home Improvement
plies store
ore
plies store
ore

ramento**West Shopping Center**

ve. and Harbor Blvd.

West-theme,
inter includes:
Food Warehouse
arket
plies store

store
rental store
eed store
aming shop
ol store
goods store
tore
-wear shop

Winters**Downtown**

795-2329

Main St. and Railroad St.

[B3]

Four blocks with 65 stores, including:

- 2 hardware stores
- appliance store
- auto supplies store
- bicycle shop
- carpet store
- gift shop
- Western-wear store
- window coverings store

Woodland**Cottonwood Plaza Shopping Center**

Cottonwood and Cross Sts.

[B5]

12 stores, including:

- PV Ranch and Home
- hospital supplies store
- jeweler

County Fair Mall

661-0777

E. Gibson Rd. and East St.

[B5]

76 stores, including:

- Gottschalk's
- JC Penney
- Mervyn's
- Target
- 13 clothing stores
- 7 shoe stores
- 5 jewelers
- 4 gift shops
- 3 sporting goods stores
- 2 bookstores
- 2 optical shops
- art and picture-framing shop
- toy store
- wicker furnishings store

Lucky Shopping Center

W. Court and West Sts.

[B5]

20 stores, including:

- Family Bargain Center
- Lucky supermarket
- 6-Star Factory Outlet
- auto supplies store
- flooring store
- paint store

Main Street Shopping District

665-5253

Main St. between East and Cleveland Sts.

[B3]

A 10-block commercial district
with stores that include:

- Craft Fare
- Cranston Bros. Hardware
- 7 antique shops
- 4 furniture stores
- 3 carpet and flooring shops
- 3 clothing stores
- 3 jewelers
- 2 auto supplies stores
- 2 baseball card shops
- 2 paint stores
- 2 thrift shops
- 2 window glass shops
- bakery
- bridal salon
- consignment shop
- costume shop
- dancewear shop
- doll shop
- hobby shop
- musical instruments store
- religious bookstore
- shoe store
- trophy shop
- used books store
- Western-wear shop

Shade Tree Plaza

California and Court Sts.

[B5]

12 stores, including:

- McMahan Furniture
- PayLess Drug Store
- paint store
- party supplies store
- variety store

Westgate Center

565-1234

County Rd. 98 and W. Main St.

[B5]

20 stores, including:

- Raley's Superstore
- card shop
- fabric store
- jeweler
- sewing machine and
vaccum cleaner store
- Western-wear shop

Certified Farmers Markets**Davis****Central Park**

756-1695

4th and C Sts.

[D5]

Wednesday, 2:00 p.m.-6:00 p.m.,
October through April; Saturday,
8:00 a.m.-noon, year-round.

Downtown

756-1695

2nd and E Sts.

[D5]

Wednesday, 5:30 p.m.-8:30 p.m.,
May through September.

Sacramento

363-3663

Downtown

K St. between 7th and 12th Sts.

[C8]

Thursday, 5:00 p.m.-9:00 p.m.,
June through October.

Montgomery Ward's Parking Lot

Country Club Center
El Camino and Watt Aves.

[C9]

Tuesday, 8:00 a.m.-11:30 a.m., year-round.

Parking Lot under I-80

8th and W Sts.

[C8]

Sunday, 8:00 a.m.-noon, year-round.

Plaza Park at City Hall

10th and J Sts.

[C8]

Wednesday, 10:00 a.m.-2:00 p.m.,
May through December.

Roosevelt Park

9th and P Sts.

[C8]

Tuesday, 10:00 a.m.-2:00 p.m.,
May through November.

Sears Parking Lot

Florin Mall
65th St. and Florin Rd.

[D8]

Thursday, 8:00 a.m.-11:30 a.m.,
year-round.

Winters

795-2329

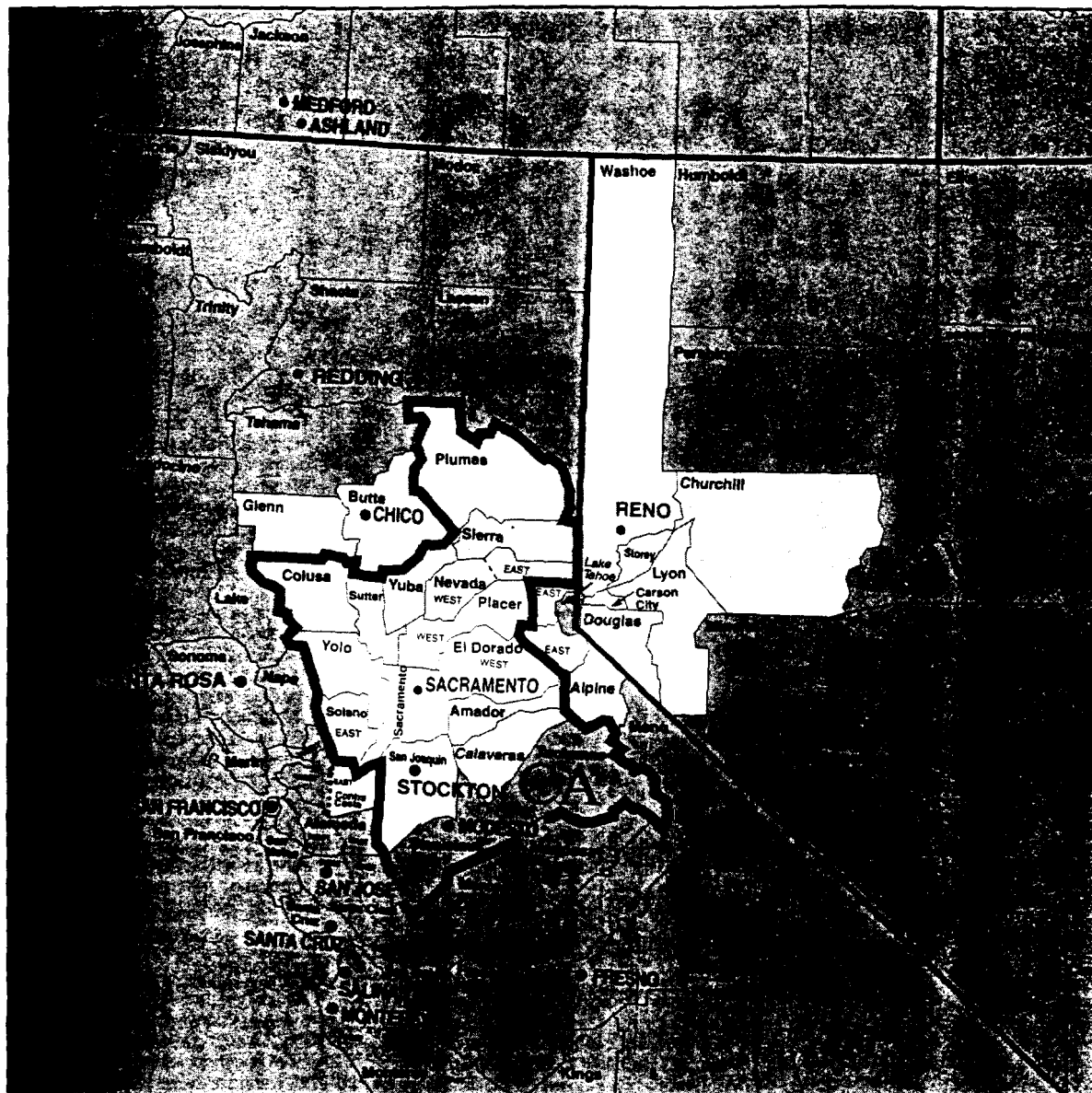
Railroad St. and Main St.

[D3]

Friday, 4:00 p.m.-8:00 p.m., year-round.

EXHIBIT B

Sacramento



☐ Metro ☐ TSA ☐ ADI

TSA and ADI sampled in Spring and Fall only. For definitions of Metro, TSA and ADI, see Paragraphs 1, 40, 53 and 22, respectively, in the back of this report.

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Metro Rank: 28

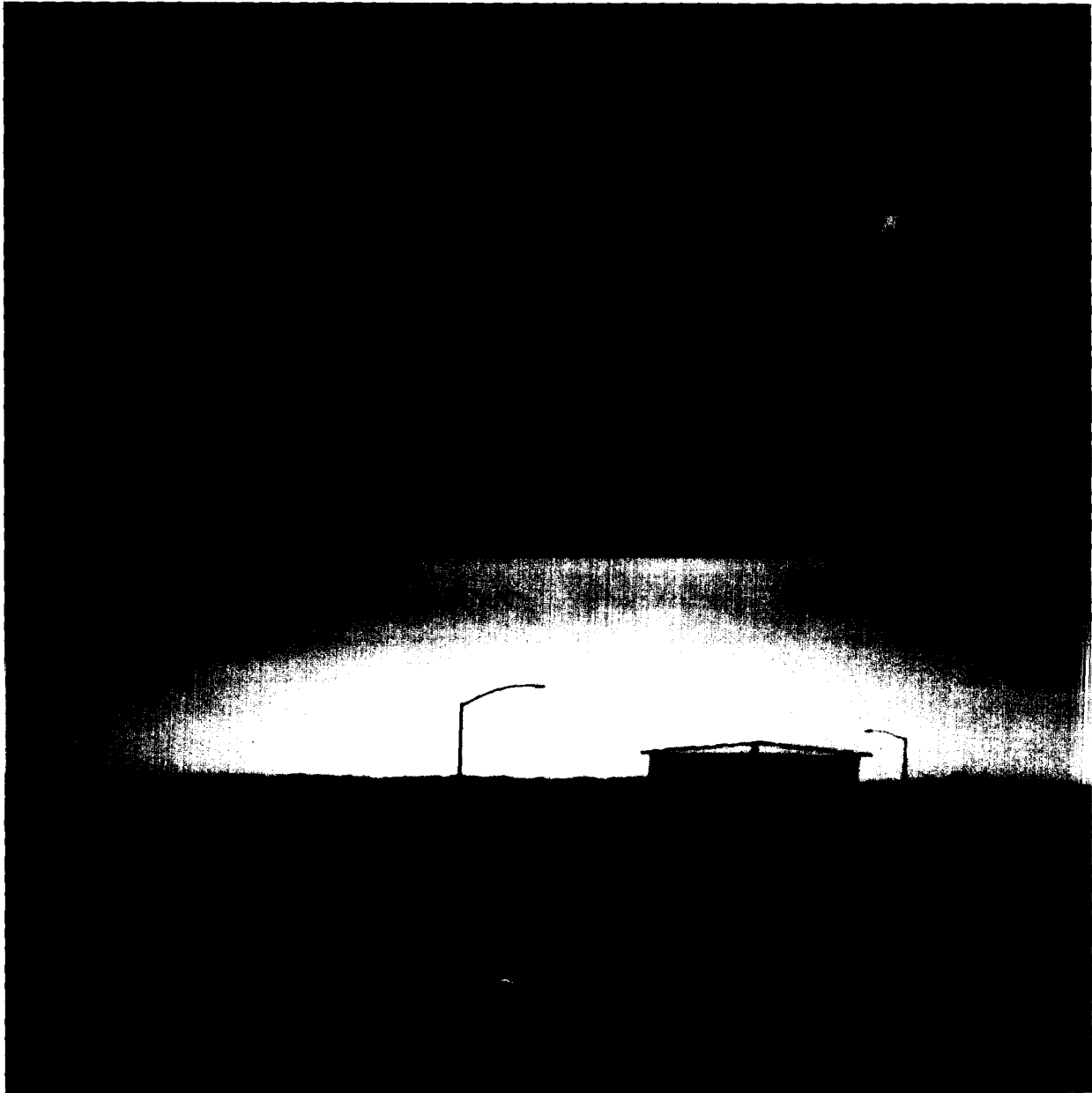
Market Surveyed: WINTER, SPRING, SUMMER, FALL

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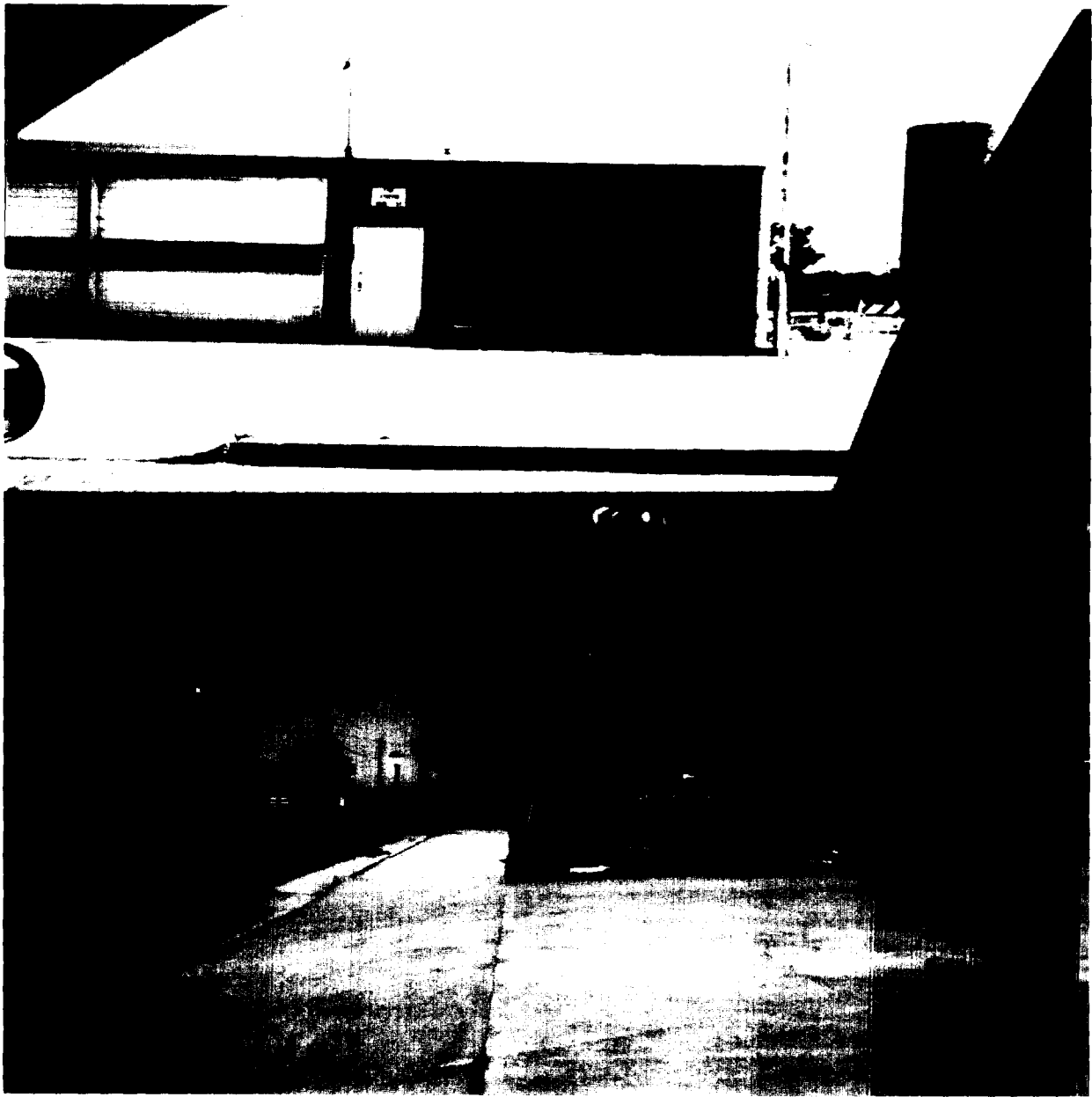
EXHIBIT C

Photographs



1 Dunnigan --Main road through Dunnigan
showin post office and general store

2. Sign says "Welcome to Dunnigan" Put up by
Dunnigan general store. Note lack of
buildings.



3. Dunnigan Fire Department Building

4. Volunteer fire Department